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PROPOSED ATTORNEY FOR DEBTOR

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TEXARKANA DIVISION

IN RE	§	
	§	
HACKLEMAN BROTHERS CONSTRUCTION, LLC	§	CASE 10-50207-11
	§	
DEBTOR	§	

**EMERGENCY MOTION FOR AUTHORITY TO USE OF CASH COLLATERAL**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Hackleman Brothers Construction LLC. (Dallas”), Debtor and moves the Court under 11 U.S.C. §363 for Emergency Approval of Interim Use of Cash Collateral and would show the Court the following:

1. The Debtor filed a voluntary Chapter 11 Petition on September 20, 2010.
2. The Debtor must have cash to make payroll and to pay other immediate expenses to keep its doors open.
3. The Debtors business consists of the ownership and operation of a construction company.
4. Texarkana First Bank (“Texarkana”) currently asserts a first lien position, on among other things the accounts receivable of Debtor (“Collateral”). This Collateral may

constitute the cash collateral of Texarkana as that term is defined in the Bankruptcy Code.

5. The Debtor is in immediately need to use the cash collateral of Texarkana to maintain operations of the business. The continued operations of the Debtor will necessitate the use of the cash collateral.

6. The Debtor seeks to use the cash collateral of Texarkana to make the payroll and continue operations. Debtor seeks interim use of the cash collateral for the uses set forth on Exhibit "A".

7. An emergency exists in that the entire chance of the Debtor's reorganizing depends on the Debtors ability to immediately obtain use the alleged collateral of Texarkana to continue operations of the companies while effectuating a plan of reorganization.

8. The Debtor is willing to provide Texarkana with replacement liens pursuant to 11U.S.C. section 552.

WHEREFORE, PREMISES CONSIDERED, the Debtor would request this matter be set down for an Emergency Hearing and that upon hearing, this Court enter and Order authorizing the Debtor's use of the Cash Collateral of Texarkana in the amounts set forth in Exhibit "A" and to grant Texarkana, adequate protection in the form of replacement liens under 11 U.S.C. section 552, and for such other and further relief as the Debtor may show itself justly entitled.

Respectfully submitted,

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By: /s/ Eric Liepins

Eric A. Liepins, SBN 12338110

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Certificate of Service

I hereby certify that a true and correct copy of the foregoing Motion was sent via telecopy or mail to Kyle Davis the attorney of record for Texarkana First Bank and the United States Trustee on this the 20th day of September, 2010.

\_\_\_\_\_/s/ Eric Liepins\_\_\_\_\_  
Eric A. Liepins

15 day budget for Hackleman Brothers

Income	\$130,000
Payroll	
9/15 – 9/22	\$7,000.00
9/23 – 9/29	\$7,000.00
9/30 – 10/6	\$7,000.00
Utilities & Phones	\$2,500.00
Subcontractors	\$40,000.00
Vendors & Suppliers	\$35,000.00
Prepaid Supplies	\$10,000.00